

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

CIVIL ACTION NO. 05-30184-KPN

IHEANYI D. OKOROAFOR)
)
Plaintiff)
)
v.)
)
COMMONWEALTH OF)
MASSACHUSETTS DEPARTMENT)
OF MENTAL HEALTH)
)
Defendant.)
)

**DEFENDANT'S ASSENTED TO MOTION
FOR AN EXTENSION TO RESPOND TO AMENDED COMPLAINT**

The Attorney General, on behalf of the defendant, requests that the Court allow this motion to enlarge the time to respond to plaintiff's amended complaint by 30 days, or until and including May 1, 2006. In support of this motion, the defendant states the following:

1. The undersigned Assistant Attorney General recently notified plaintiff's counsel pursuant to LR 7.1(A)(2) of the undersigned's belief that there are several fatal problems with the claims pled in the amended complaint. The plaintiff's counsel needs additional time to investigate the asserted problems.
2. Plaintiff's counsel assented to the above extension to respond to the complaint.
3. Allowance of this motion is in the interest of judicial economy, as it could avoid the Court and the parties having to resolve the issues on a motion to dismiss.

WHEREFORE, for the above reasons, the defendant requests that the Court grant this motion to enlarge the time to respond to plaintiff's amended complaint until and including

May 1, 2006.

DEFENDANTS,

**THOMAS F. REILLY
ATTORNEY GENERAL**

By: /s/ Timothy M. Jones

Timothy M. Jones
Assistant Attorney General
Western Massachusetts Division
1350 Main Street, 4th Floor
Springfield, MA 01103
(413)784-1240 ext. 105
(413)784-1244 - Fax
BBO#618656

CERTIFICATE OF SERVICE

I, Timothy M. Jones, hereby certify this the 30th day of March, 2006 that it is my understanding that plaintiff's counsel will be served with this pleading via the CM/ECF filing system.

By: /s/ Timothy M. Jones
Timothy M. Jones